

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN**

CARILIUS MEDIA, BV, a foreign corporation,  
and FLORIS VAN PALLANDT, an individual

Plaintiffs,

v.

THE BOARD OF REGENTS OF MICHIGAN  
STATE UNIVERSITY,

and

ALAN HALLER, in his capacity as Vice  
President and Director of Intercollegiate  
Athletics at Michigan State University, and  
in his personal capacity,

Defendants.

Case No. 1:24-cv-00825-HYJ-RSK

Hon. Hala Y. Jarbou

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**DEFENDANTS' RULE 12(b)(1) AND RULE 12(b)(6) MOTION TO DISMISS  
PLAINTIFFS' FIRST AMENDED COMPLAINT**

**ORAL ARGUMENT REQUESTED**

Defendants The Board of Trustees of Michigan State University, incorrectly named as The Board of Regents of Michigan State University, and Alan Haller in his official and individual capacities, hereby move pursuant to Federal Rule of Civil Procedure 12(b)(1) and Federal Rule of Civil Procedure 12(b)(6), to dismiss Plaintiffs' First Amended Complaint in its entirety, with prejudice, for the reasons and based on the law set forth in the accompanying brief. Plaintiffs intend to oppose this motion.

Respectfully submitted,

/s/ Zachary Behler  
Assistant General Counsel  
Michigan State University  
*Attorney for Defendant*

/s/ Matthew Daniels  
Assistant General Counsel  
Michigan State University  
*Attorney for Defendant*

**CERTIFICATE OF SERVICE**

I hereby certify that on November 22, 2024, I caused the foregoing paper to be electronically filed with the Clerk of the Court using the ECF system which will send notification of such filing to all attorneys of record.

/s/ Matthew Daniels  
*Attorney for Defendant*